



City of Santa Barbara California

PLANNING COMMISSION STAFF REPORT

REPORT DATE: February 15, 2018
AGENDA DATE: March 1, 2018
PROJECT NAME: General Plan Map Amendment and Local Coastal Program Amendment
TO: Planning Commission
FROM: Planning Division, (805) 564-5470
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I. RECOMMENDATION

That the Planning Commission consider and forward a recommendation to City Council for adoption of:

- 1) A General Plan Map Amendment (MST2018-00070) bifurcating the adopted General Plan Map at the Coastal Zone boundary as certified by the California Coastal Commission (CCC) on September 14, 2017, except in the Airport Area, to create a General Plan Land Use Map for the Inland and Airport Areas (no other changes proposed) and a General Plan Land Use Map for the Coastal Zone, with minor land use designation name changes; and,
- 2) A Local Coastal Program (LCP) Amendment (MST2018-00070) comprised of:
 - A. An update to the Coastal Land Use Plan (LUP);
 - B. General Plan Land Use Map for the Coastal Zone.

II. BACKGROUND

Local Coastal Program Background

The California Coastal Act (Coastal Act) of 1976 creates a partnership between the state (acting through the California Coastal Commission) and local governments with jurisdictional limits within the Coastal Zone to manage shoreline public access, recreation, terrestrial and marine habitats, views of the coast and scenic coastal areas, and other resources by regulating proposed development within the Coastal Zone. The Coastal Act requires all local governments located within the Coastal Zone to prepare a LCP, which is defined as "a local government's land use plans, zoning ordinances, zoning district maps, and, within sensitive coastal resources areas, other implementing actions, which, when taken together, meet the requirements of, and implement the provisions and policies of [the Coastal Act] at the local level." The LCP serves as the standard of review for Coastal Development Permits under the City's jurisdiction within the

Coastal Zone. Under the Coastal Act, development activities are broadly defined to include (among others) demolition, construction, replacement, or changes to the size of a structure, divisions of land, and activities that change the intensity of use of land or public access to coastal waters.

The City's LCP consists of a Coastal LUP, originally certified by the California Coastal Commission (CCC) in 1981, and an Implementation Plan (IP) that was originally certified in 1986. The Coastal LUP designates land uses and includes planning policies and programs that implement the Coastal Act's overarching goals: protection, enhancement and balanced use of coastal resources; maximization of public access to the coast; and prioritization of coastal-dependent and coastal-related uses. The IP includes detailed zoning and implementing ordinances found in the Municipal Code and other guidelines designed to carry out the more general policies of the Coastal LUP. Together, these served as the standard of review for Coastal Development Permits (CDPs) under the City's jurisdiction within the Coastal Zone.

In 2013, the Planning Division initiated a work effort to update the City's LCP. The primary goals of this overall major work effort are:

1. Modernize the 1981 Coastal LUP.

The 1981 Coastal LUP incorporates, by reference, policies from many documents, including policies of the General Plan as it existed in 1980. Over time, this structure has created complications in determining when LCP Amendments are required and the appropriate standard of review for CDPs. One of the major goals of the LCP Update is to modernize the 1981 Coastal LUP and fix this problem by making the Coastal LUP a stand-alone document.

2. Incorporate the 2011 General Plan land use and policy changes that are applicable in the Coastal Zone into the LCP and add policy guidance in certain emerging and controversial issue areas (e.g., development near coastal bluffs and the shoreline, protection of biological resources and creeks, and preservation of lower-cost visitor-serving accommodations).

A lack of detailed guidance in the existing 1981 Coastal LUP in some of these areas has led to significant workload for staff, Planning Commission and, at times, City Council. It has also led to uncertainties for applicants as to the exact development standards to which their projects will be held by both the City and the CCC on appeal.

3. Address sea level rise (SLR) vulnerability and adaptation.

As a result of climate change, SLR is occurring, and the physical risks to Santa Barbara's Coastal Zone include, but are not limited to, shoreline erosion and degradation, amplified storm surges, and permanent inundation. Policies in the 2011 General Plan direct the City to further study the potential impacts of SLR and prepare a SLR Adaptation Plan. The CCC also now requires that LCPs address SLR vulnerability and adaptation strategies,

and that proposed development be evaluated for SLR impacts. There is a need for the City and the community to understand this emerging issue and all the associated risks, as well as a need for additional guidance and standards for coastal bluff top and shoreline development.

Grant Funding

The CCC's Local Coastal Program Local Assistance Grant Program provides funds to support local governments in completing or updating LCPs consistent with the Coastal Act, with special emphasis on planning for SLR and climate change. The City was awarded CCC Local Coastal Program Local Assistance Grant Program grant funds from Round 1 and Round 3 of the program, described below.

Round 1 California Coastal Commission Local Coastal Program Local Assistance Grant Funds

In 2014, the City received a \$123,000 grant from the CCC Round 1 Local Coastal Program Local Assistance Grant Program to update the City's LCP. Staff began work in February 2014, and that grant ended on April 29, 2016. Originally, the Round 1 grant funding required the City to submit to the CCC a locally approved Draft Coastal LUP by April 30, 2016. In February 2016, staff submitted a Preliminary Draft Coastal LUP to the CCC but, based on extensive written comment received from CCC staff in April 2016 and unanticipated delays on other materials related to SLR, staff and the CCC agreed to delay the release of the Public Review Draft Coastal LUP and to have the City apply for the CCC's Round 3 Local Coastal Program Local Assistance Grant Program funds in order to continue working on the overall LCP Update program.

Round 3 California Coastal Commission Local Coastal Program Local Assistance Grant Funds

In 2016, City Council authorized staff to submit an application for grant funds from the CCC's Round 3 Local Coastal Program Local Assistance Grant Program. On August 12, 2016, the CCC awarded \$285,892 in grant funds to the City for a public outreach plan for the draft Coastal LUP, a SLR Adaptation Plan, a Lower-Cost Visitor-Serving Accommodations Work Program, and for overall project management. The grant period began in January 2017 and ends in April 2019. Brief descriptions of the grant tasks are included in the Other Related LCP Work Efforts section below.

LCP Update Process

The overall LCP Update process began in 2013 with staff creating a record of the City's LCP as certified by the CCC in order to attempt to reach agreement with CCC staff on the master list of all LCP resources, maps, and amendments comprising the full content of the LCP. The work effort continued from there with multiple meetings and submittals of draft Coastal LUP chapters to the CCC regional staff in Ventura. Exhibit A documents the LCP Update Meetings and Milestones from 2013 to early February 2018, and some are described in greater detail below.

California Coastal Commission

Both the CCA and the California Code of Regulations provide the process requirements for LCP Amendments. Specifically, CCR §13516 states that “to the extent possible” a local government shall coordinate (otherwise referred to as consultation) with the CCC staff to resolve issues with an LCP Amendment as to conformity and sufficiency with meeting the requirements of the CCA. The consultation process occurs prior to formal submittal of an LCP Amendment to the CCC. Without the extensive consultation process, it is likely that the conformity and sufficiency issues will be included as conditions to an LCP Amendment certification action in what are termed “suggested modifications.” The City would then review the CCC’s suggested modifications, and decide whether to accept the suggested modifications. It has been in the City’s best interest to consult with the CCC staff and that consultation process is described below.

Since 2014, the City worked diligently and collaboratively with CCC staff to produce multiple drafts of the Coastal LUP as documented in Exhibit A (Meetings and Milestones). This consultation process included multiple meetings and 13 separate submittals of either draft chapters and/or entire preliminary drafts of the Coastal LUP to CCC staff for review. At times the relationship was challenging, including significant delays in the coordination process due to staff changes at the regional CCC office in Ventura. Twice in 2015, City staff conducted a coastal site tour, including a boat trip, with new CCC staff members to visually orient them to the City’s unique setting and coastal issues.

March 1, 2016 was the City’s first complete submittal to CCC staff of the Preliminary Draft Coastal LUP. On April 29, 2016, the CCC submitted extensive written comments on the Preliminary Draft Coastal LUP, including significant comments in the following issue areas:

- Requirements for future LCP Amendments for certain development projects to be approved;
- Clarifying when maintenance, repair, or additions to structures is so extensive as to constitute new development subject to all the development standards in the LCP;
- Conditions for development near coastal bluffs and the shoreline;
- Requirements for development in shoreline hazard areas;
- Standards for creek and biological buffers and allowed uses in buffers;
- Limits on future upgrades to existing public water and wastewater infrastructure and limits on capacities of those systems;
- Requirements for mitigation fees for hotel/motel projects not considered lower cost; and
- Technical report requirements and interim policies addressing SLR.

Given the scope of the CCC staff comments, the planned public release of the Draft Coastal LUP and outreach effort that was scheduled to occur in summer 2016 was delayed. Instead, staff met with the City Administrator, the CCC’s Executive Director, and other CCC staff, to commit the City and CCC to prioritizing release of a revised Draft Coastal LUP for public review. CCC staff also agreed to phase the LCP Update so that the Draft Coastal LUP would proceed while the SLR Adaptation Plan and Lower-Cost Visitor-Serving Accommodations Program are developed, processed, and certified on a separate schedule (described in further detail below).

Most of the CCC staff's comments on the Preliminary Draft Coastal LUP were addressed through education and negotiation with CCC staff throughout 2016 and up to release of the Public Review Draft Coastal LUP in November 2017. In January 2018, CCC staff submitted written comments on the Public Review Draft, most of which were addressed through policy clarifications and modifications to the 2018 Planning Commission Review Draft Coastal LUP (Exhibit B). CCC staff have stated that they will review the 2018 Planning Commission Review Draft Coastal LUP and provide written comments on an as-needed basis.

LCP Update Subcommittee

In 2014, the LCP Update Subcommittee was formed comprised of three members each of the Planning Commission, Parks & Recreation Commission, and Harbor Commission to periodically meet with staff to review the Draft Coastal LUP approach, content, and format. Input from the Subcommittee members has been instrumental to preparing each version of the Draft Coastal LUP. In total, there were eight joint subcommittee meetings between 2015 and 2017, as well as several meetings with each individual subcommittee.

City Inter-departmental Coordination

Throughout this process, Planning staff continually checked in with other City staff from the Parks & Recreation Department, Waterfront Department, Public Works Department, City Administrator's Office, and City Attorney's Office. This was a time intensive process; however, it did ensure that the draft policies and CCC staff suggested edits were supportable throughout the City organization.

Sea Level Rise Coordination

One of the award conditions of the Round 1 and Round 3 Local Coastal Program Local Assistance Grant Programs is regional coordination of SLR work between other jurisdictions and entities working on SLR including early coordination meetings, sharing technical analyses and lessons learned, and consideration of regional adaptation policies. This coordination began in 2014 and is detailed in Exhibit C. Staff coordinated with Master's Degree students from the University of California Santa Barbara (UCSB) Bren School of Environmental Science and Management; Santa Barbara County's Coastal Resiliency Project; and partnering in the Coastal Ecosystem Vulnerability Assessment (CEVA), a collaborative effort between California Sea Grant, UCSB's Santa Barbara Coastal Long-Term Ecological Research Program, Scripps Institution of Oceanography, and the United States Geological Survey (USGS) Coastal Storm Modeling system.

III. DISCUSSION

2018 Planning Commission Review Draft Coastal LUP

For the most part, the 2018 Planning Commission Review Draft Coastal LUP (Exhibit B) carries forward policies that already exist in other City planning documents and regulations. New policies document the criteria and interpretations being used today for the review of CDPs, clarify

development standards for complicated topics such as development near coastal bluffs and creeks, and address emerging issues for the City, such as SLR. The 2018 Planning Commission Review Draft Coastal LUP is structured around coastal resources and Coastal Act policies specific to the City of Santa Barbara. Each chapter starts with the Coastal Act policies that are germane to the topic, relevant to the City, and serve as guidance for the Coastal LUP. The Coastal Act policies are followed by text providing background information and the Coastal LUP policies relating to the topic.

The 2018 Planning Commission Review Draft Coastal LUP policies are divided into three categories:

1. “City Planning Efforts and Programs,” which include policies to be implemented by the City, either as City initiatives, through regulations, or other City programs;
2. “Development Review Policies” that provide standards for the review of development proposals through a CDP process; and
3. “Definitions and Procedures” that provide detailed guidance in the interpretation of terms and procedures followed during the development review process.

A summary of the 2018 Planning Commission Review Draft Coastal LUP chapters follows.

Introduction

Chapter 1.1: The Coastal Act, Chapter 1.2: Santa Barbara’s Local Coastal Program, and Chapter 1.3: Santa Barbara’s Coastal Zone

These chapters provide background and setting to inform the rest of the document and include descriptions and maps of the Coastal Zone divided into smaller Component Areas and a number of overarching development review policies in Chapter 1.2, including the relationship of the Coastal LUP to the Coastal Act, the General Plan, City Powers and other agreements, resolution of policy conflicts and property takings policies.

Coastal Land Uses

Chapter 2.1: Land Use & Development

This chapter includes an illustrative Land Use Map (Figure 2.1-1) and overarching land use policies. The land use designations as depicted on Figure 2.1-1 are compatible with Coastal Act policies that encourage and protect visitor-serving uses (e.g., hotels, motels, parks, and Stearns Wharf), beach access and recreational uses, and coastal-dependent and related uses (e.g., the Harbor) as higher priority land uses in the Coastal Zone. The Land Use Map is consistent with the proposed General Plan Land Use Map for the Coastal Zone (Exhibit I).

In some cases, policies in the 2018 Planning Commission Review Draft Coastal LUP differentiate development standards for new development and substantial redevelopment versus repair and maintenance, alterations, and additions to existing structures. The policies in the Land Use & Development chapter define these terms and also include direction for determining when an existing structure is redeveloped to a degree that is considered “substantial redevelopment.”

Substantial redevelopment is treated the same as new development and requires compliance with all the policies and provisions of the Coastal LUP.

Chapter 2.2: Coastal-Dependent & Related Development

This chapter focuses mainly on the Harbor and Stearns Wharf as the City's primary commercial and recreational oriented coastal-dependent and coastal-related development and use areas. This chapter updates and incorporates policies of the certified 1996 Harbor Master Plan that are still applicable for issuance of CDPs, and includes no change to existing procedures or practices for Harbor and Stearns Wharf facilities or uses.

Public Access & Recreation

Chapter 3.1: Public Access

One of the fundamental goals of the Coastal Act is to provide maximum public access to the shoreline, along the coast, and to public recreation areas. Generally, the City is already in alignment with the Coastal Act by providing abundant public access to the shoreline and along the coast and ample oceanfront land for recreational use. The policies, therefore, mostly confirm the City's commitment to providing and protecting public access to and along the coast, including the California Coastal Trail and the City-owned public coastal bluff stairways to the beach. This chapter also updates and incorporates the Coastal Zone portion of the City's Circulation Element policies, which support a transportation system that achieves equality of convenience and choice among all modes of transportation, including increasing walking, bicycling, and transit as transportation modes.

Public parking is an important issue to the CCC with regard to maximizing access to and along the shoreline and coastal recreation areas. During the extensive consultation period with CCC staff, public parking policies were significantly revised and City staff proposed new policies to designate and preserve "Key Public Access Parking Areas" that provide public access to the shoreline, coastal recreation areas, Stearns Wharf, and the Harbor. The Key Public Access Parking Areas are mostly public parking lots and some on-street parking in the Waterfront area and coastal bluff areas near public coastal bluff stairways and coastal recreation sites, as described in Chapter 3.1 and shown on Figure 3.1-2. Proposed policies protect Key Public Access Parking Areas by prohibiting parking restrictions that would have the effect of reducing public access to the coast and/or limiting the use of these parking areas for reasons other than public access to the shoreline, coastal recreation areas, Stearns Wharf, and the Harbor, unless mitigated.

Chapter 3.2: Visitor-Serving & Recreational Facilities

Visitor-serving and recreational facilities are an important part of the character and economy of Santa Barbara. This chapter has an emphasis on protecting and encouraging lower-cost recreation and overnight accommodations to ensure that lower income members of the public, including those who live further inland, can afford to recreate and/or stay at the coast. The policies in this chapter continue the City's commitment to protecting recreational facilities and coastal areas for ocean- and water-oriented recreational use. Policies found in the 2018 Planning Commission Review Draft Coastal LUP relating to lower-cost overnight accommodations are interim until a separate work effort to study how best to preserve existing and encourage new lower-cost

overnight accommodations is completed (described below under Other Related LCP Work Efforts).

Coastal Resources Protection

Chapter 4.1: Biological Resources

The Coastal Act provides strong protection for creeks, wetlands, and other habitats that are especially rare or valuable, referred to as environmentally sensitive habitat areas (ESHAs). This chapter includes policies to protect biological resources, encourage restoration, and clarify development standards for projects within or near creeks, wetlands, and ESHAs. The advantages of including detailed development standards and habitat buffers in the 2018 Planning Commission Review Draft Coastal LUP are that everyone (planners, property owners, City decision makers, CCC, and the public) know what to expect, there is consistency in coastal development permitting at the local and state level, and permit processing times and appeals, and associated costs, can potentially be reduced.

Policies in the 2018 Planning Commission Review Draft Coastal LUP provide guidance for which habitats constitute ESHAs (e.g., riparian areas, creeks, wetlands, oak woodlands, estuaries), how to determine the top of bank of creeks, and how wetlands are defined by the Coastal Act. Policies also outline allowed uses within creeks, wetlands, and ESHAs that expand upon those contained in the Coastal Act. Restoration is an allowed use and encouraged in creeks, wetlands, ESHAs, and habitat buffers.

Numeric minimum habitat buffers for creeks, wetlands, and ESHAs are proposed that address creek erosion hazards and protect ESHAs consistent with the mandates of the Coastal Act. The size of the buffers also factor in that the City is an urban landscape with limited options for moving existing structures significantly away from creeks and habitats. The numeric buffers were determined through a complex process of analyzing creeks and habitats in relation to property and development configurations with the goal that the majority of property owners would be able to enjoy a reasonable use of their property in these sensitive areas. Policies in this chapter address allowed uses and management measures (e.g., appropriate landscaping) within habitat buffers and also address situations where the required minimum numeric buffers cannot be met on severely constrained lots or for certain public uses.

Chapter 4.2: Water Quality

The Coastal Act requires new development to be designed to protect the biological productivity and quality of coastal waters, streams, wetlands, and estuaries. This chapter addresses City planning efforts and programs to improve water quality, management of the harbor and other marine areas, wastewater facilities, and best management practices during construction. The Water Quality chapter requires development to adhere to the City's existing Storm Water Management Program, as well as other methods to protect and improve water quality.

Chapter 4.3: Scenic Resources & Visual Quality and Chapter 4.4: Cultural Resources

These chapters includes policies following existing policy direction and protocols for protecting public scenic views and important visual resources and protecting archaeological and

paleontological resources. The policies in these chapters provide clear criteria for issuing CDPs for projects within or near resources.

Coastal Hazards & Adaptation

Chapter 5.1: Coastal Hazards

This chapter addresses the host of natural hazards present in the coastal area of the City including geologic, seismic, erosion, flooding, wildfire, and shoreline hazards. The general geologic, seismic, erosion, flooding, and wildfire hazards present throughout the City are addressed using existing policy direction from the City's 2013 Safety Element and established protocols for evaluating proposed development in hazard areas. Policies addressing shoreline hazards required extensive study and analysis to develop appropriate screening areas and procedures for evaluating shoreline hazards, using best available science.

Santa Barbara's coastal bluffs and beaches are subject to beach erosion, coastal bluff erosion, coastal bluff slope failure, coastal flooding, and wave impacts that may substantially increase in the coming years due to the effects of projected SLR, subjecting the City to increased vulnerabilities. Addressing SLR is of paramount importance to the CCC, as well as other resource protection agencies. This chapter includes direction on screening proposed development, requirements for technical studies, allowed uses including shoreline protection devices, and development standards in these shoreline hazard areas. As part of a separate work effort, the City is developing a SLR Adaptation Plan that will take a detailed look at the City's vulnerabilities and possible actions to prepare for and adapt to the impacts of projected SLR. This chapter includes interim policies that consider the potential for increased shoreline hazards due to SLR that will remain in effect until the SLR Adaptation Plan is complete.

Public Services and Facilities

Chapter 6.1: Public Works & Energy Facilities and Chapter 6.2: Highway 101

These chapters include policies that support the City's water conservation programs, long term water supply plans, and energy efficiency. Because Highway 101 is a major transportation corridor in the Coastal Zone and because of concerns with the potential impacts of projects to the highway, in 1994 an LCP Amendment was certified to ensure any projects constructed within the City's portion of the Highway 101 corridor protect and enhance existing recreational, visitor-serving, and public access opportunities and are consistent with the protection of scenic views, historic resources, water and marine resources, and community character, and maximize the use of feasible alternative modes of transportation. The existing policies from the 1994 LCP Amendment are updated and carried forward.

Public Outreach

The original LCP Update scope of work envisioned building off the Plan Santa Barbara public outreach effort, integrating the 2011 General Plan and 2012 Climate Action Plan policies into an updated Coastal LUP, and ensuring the LCP reflects current conditions and conformance with the Coastal Act.

Through the process of coordinating with CCC staff, the scope of the LCP Update work effort significantly expanded to include what amounted to a comprehensive overhaul of the City's Coastal LUP. Given this, staff determined a more extensive public outreach program was needed for the Public Review Draft Coastal LUP, and subsequent drafts, than originally anticipated and a public outreach process was funded as part of the Round 3 CCC Local Coastal Program Local Assistance Grant Program. The City used the grant funds to hire a consultant to assist staff with drafting key messages, developing project specific webpage content and design, preparing media and community relations releases and community presentations, and planning for a public open house to release the Public Review Draft Coastal LUP. Exhibit D details public outreach components conducted in preparation for the Open House and release of the Public Review Draft Coastal LUP and some are described in greater detail below.

Release of the Public Review Draft Coastal LUP

The Public Review Draft Coastal LUP was released for a 60-day public review period on November 11, 2017, concurrent with a public Open House. The document was made available online on the LCP Update webpage and hard copies were available for review at the Main Public Library and City Planning Division office. The document release and open house were advertised in the media, via several email notifications, and on multiple posters available within the Coastal Zone.

Public Open House

A public Open House was held on Saturday November 11, 2017, from 11:00 a.m. to 3:00 p.m., at the Chase Palm Park Center. The Open House included stations staffed by City staff on topics such as background and history of the Coastal Act and the City's LCP, Draft Coastal LUP sections, creeks and environmentally sensitive habitat areas, shoreline hazards and SLR, jurisdictional mapping and parcel information, coastal development permitting, and other city efforts, such as the New Zoning Ordinance. The Open House was attended by approximately 50 people, including public officials, property owners, land use planners, and members of Commercial Fisherman of Santa Barbara.

Community Presentations

City staff made informational presentations on the Public Review Draft Coastal LUP to the Parks & Recreation Commission, Harbor Commission, and Creeks Advisory Committee in November 2017, shortly after the public Open House was held. The presentations focused on items of interest to each Commission/Committee.

The informational presentations were followed by seven stakeholder meetings on the Public Review Draft Coastal LUP to local environmental groups, permit planners, architects, and Santa Barbara City College staff (Exhibit E). The stakeholder meetings were very well received.

Comments on the Public Review Draft Coastal LUP

The review period on the Public Review Draft Coastal LUP was 60 days after release, ending on January 11, 2018. At the close of the public review period, seven written comment letters were received (Exhibit F). The Creeks Advisory Committee and Harbor Commission submitted written comments generally supporting the policies of the Public Review Draft Coastal LUP. The Parks & Recreation Commission has not submitted written comments as of the writing of this staff report. Other comments received mainly focused on biological resources and several comment letters expressed strong support for policies establishing buffers for creeks, wetlands, and environmentally sensitive habitat areas and for the SLR adaption planning effort. Staff consulted internally with other City Departments on the comments and addressed most of them through policy modifications. Responses to the comments are provided by topic in Exhibit G. The 2018 Planning Commission Review Draft Coastal LUP incorporates comments received as of January 11, 2018. A version showing changes between the Public Review Draft and 2018 Planning Commission Review Draft is available on the LCP website.

As indicated earlier in this report, CCC staff have stated that they will review the 2018 Planning Commission Review Draft Coastal LUP and provide written comments on an as-needed basis.

General Plan Map Amendments

Staff is recommending a related General Plan Map Amendment to create a stand-alone General Plan Land Use Map for the Coastal Zone, with minor land use designation name changes. The existing General Plan Map covers the entire City, including the Airport Area, and was adopted by City Council in 2011 together with the General Plan, and amended in 2013, with additional minor amendments thereafter. However, the General Plan Map was not certified by the CCC and therefore, is not in effect in the Coastal Zone. Currently, what serves as the land use map for the Coastal Zone are the 1981 certified Land Use Maps (Overall Coastal Zone and Waterfront), as amended.

In order to submit a stand-alone land use map for certification to the CCC, a General Plan Map Amendment is proposed. The amendment is proposed to bifurcate the adopted 2013 General Plan Map, as amended, at the Coastal Zone boundary as certified by the CCC on September 14, 2017, (except at the Airport Area) to create a General Plan Land Use Map for the Inland and Airport Areas, with no other changes proposed (Exhibit H). This will also result in a stand-alone General Plan Land Use Map for the Coastal Zone (Exhibit I).

The amendment will also unbundle the consolidation (done as a part of the 2011 General Plan Map and carried forward to the adopted 2013 General Plan Map) of three land use designations in the Coastal Zone that resulted in changing the CCC certified Hotel & Related Commerce I and II and Coastal-Oriented Commercial land use designations to Ocean-Related Commercial/Medium High Residential land use designation (as illustrated on Exhibit J). The change to the land use designation name does not change the type, density or intensity of land uses allowed.

Following Planning Commission consideration and recommendation, the General Plan Map Amendment will be forwarded to the City Council for adoption. The adopted General Plan Land Use Map for the Coastal Zone will be included with the adopted Coastal LUP in the LCP Amendment, and the LCP Amendment will be submitted to the CCC for certification.

Other Related LCP Work Efforts

Post-Certification Permit and Appeal Jurisdiction Map

The CCC's administrative regulations provide that a map depicting the areas of continuing CCC permit and appeal jurisdiction be adopted in conjunction with final LCP certification. The LCP update procedure also provides the basis for revision and re-adoption of maps by the CCC. In 2015, the CCC began working on a GIS-based version of the Post-Certification Permit and Appeal Jurisdiction Map covering the City of Santa Barbara. The CCC worked with City staff over time to refine the map. In June 2017, staff provided information to the Planning Commission on the revised map. The CCC certified the map on September 14, 2017.

SLR Adaptation Plan

In 2016, the Round 3 CCC Local Coastal Program Local Assistance Grant Program awarded the City approximately \$180,000 in funds for preparation of a SLR Adaptation Plan. The SLR Adaptation Plan will use as a foundation the work completed to date, including existing conditions analyses, vulnerability assessments, SLR modeling, and maps. With the use of technical consultant services and the most accurate and timely (i.e. best available science) SLR information available, an analysis of impacts and feasible adaptation strategies to low-lying and coastal bluff areas in the City's Coastal Zone will be completed. This information will be synthesized with an economic and fiscal analysis to identify the trade-offs of a range of adaptation strategies and to draft policies and development standards for inclusion in the City's LCP and other planning documents. The consultant contract was approved by City Council on February 6, 2018, project kick-off is expected to occur the last week of February, and the draft SLR Adaptation Plan is scheduled to be complete by the end of April 2019. Stakeholder involvement and public outreach will be conducted during development of the plan. The project will conclude with a package of draft LCP Amendments presented to the Planning Commission and City Council in late spring/summer 2019 and submitted to the CCC for certification after the grant term is over.

Lower-Cost Overnight Accommodations Study

In 2016, the Round 3 CCC Local Coastal Program Local Assistance Grant Program awarded the City approximately \$18,000 in funds for a study to analyze various strategies to preserve and encourage lower-cost visitor-serving accommodations as directed by the Coastal Act and Draft Coastal LUP policies. With the use of technical consultant services the study will include a baseline inventory of overnight accommodations in the Coastal Zone, analysis of options to facilitate preservation and development of lower-cost overnight accommodations such as business improvement funds, tax incentives, mitigation/impact fees etc., policy development, and public and stakeholder involvement. It will examine local and regional strategies and both

mitigation fee and non-mitigation fee alternatives to expand lower-cost overnight accommodations. Review of consultant proposals for this project is underway and the work will be initiated in spring 2018. As with the SLR Adaptation Plan, stakeholder involvement and public outreach will be conducted during the study and the project is anticipated to conclude with a package of draft LCP Amendments in spring 2019 for submittal to the CCC for certification after the grant term is over.

New Zoning Ordinance

The New Zoning Ordinance (NZO) was adopted by City Council in July 2017 and became effective outside of the Coastal Zone on October 1, 2017. The NZO will not go into effect in the Coastal Zone until it has been certified by the CCC as an LCP Amendment. Until that time, the Title 28 Zoning Ordinance (temporarily renamed “Coastal Zoning Ordinance”), is in effect. The NZO submittal to the CCC is planned to occur in mid- 2018, after minor clean-up amendments to NZO are processed through the local level.

LCP Update to the Implementation Plan

Following submittal of the adopted Coastal LUP to the CCC for certification, there are a number of LCP IP zoning amendments to be processed by staff. The proposed IP amendments include repealing guidelines and memos that are no longer applicable to the LCP and changes to the Coastal Overlay Zone (S-D-3) for consistency with the adopted Coastal LUP and to reflect current administrative practices.

IV. ENVIRONMENTAL REVIEW

Local Coastal Program Amendment

Section 21080.5 of the Public Resources Code and Section 15265 of the Guidelines for Implementation of the California Environmental Quality Act (CEQA) exempts local governments from CEQA compliance in connection with preparation and adoption of a Local Coastal Program. The CCC's LCP review and approval program has been found by the Resources Agency to be functionally equivalent to the EIR process.

General Plan Map Amendment

The proposed General Plan Map Amendment is procedural and does not involve any material changes to the General Plan Map that was adopted in 2011 and analyzed as part of the 2011 General Plan Certified Final Program Environmental Impact Report (FEIR), which assessed citywide environmental impacts associated with future non-residential and residential growth for the next 20 years. In 2013, an Addendum to the FEIR was prepared in accordance with State CEQA Guidelines Sections 15168 (Program EIR) and 15164 (Addendum to EIR) to document additional minor changes to the adopted 2013 General Plan Map, none of which occurred in the Coastal Zone. City Council’s resolution to adopt the proposed General Plan Map Amendments will include the appropriate CEQA findings.

V. NEXT STEPS

Following the Planning Commission's consideration and recommendation, the General Plan Map Amendment and LCP Amendment will be forwarded to the City Council for adoption. City Council adoption will be followed by a submittal of the LCP Amendment to the CCC for certification. The CCC will take action to determine if the submittal is deemed complete, and, it is possible that the Commission will request a one-year time extension. Until the CCC certifies the adopted Coastal LUP, the 1981 LUP and certified Land Use Maps remain in effect in the Coastal Zone.

The SLR Adaptation Plan and Lower-Cost Overnight Accommodations Study, anticipated for completion in spring 2019, will likely result in recommendations for amended or new policies in the Recreation and Visitor-Serving and Coastal Hazards chapters of the Coastal LUP. If so, the amended or new policies would be reviewed, locally adopted, and submitted for certification as an LCP Amendment to the CCC.

EXHIBITS

- A. Meetings and Milestones
- B. 2018 Planning Commission Review Draft Coastal Land Use Plan – *Under Separate Cover*
- C. Sea Level Rise Coordination
- D. Public Outreach Components
- E. Stakeholder Meeting Schedule
- F. Comments on the Public Review Draft Coastal LUP (November 2017)
- G. City Response to Comments Received by January 11, 2018, on the Public Review Draft Coastal LUP (November 2017)
- H. Draft General Plan Land Use Map for the Inland and Airport Areas
- I. Draft General Plan Land Use Map for the Coastal Zone
- J. Illustration of Land Use Designation Name Changes to the General Plan Land Use Map for the Coastal Zone